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Attorney for Defendant
B & B Management Group, LLC,
dba Bellach's Leather for Living

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

SUSAN SANDELMAN, AS TRUSTEE
OF THE ESAN TRUST,

Plaintiff,

v.

B&B PROPERTY MANAGEMENT, LLC,
dba BELLACH'S LEATHER FOR LIVING,

Defendant.

No. C08 00681 HRL

DEFENDANT'S NOTICE OF MOTION
AND MOTION TO STAY ACTION
PENDING ARBITRATION

Complaint Filed: January 29, 2008

Date: April 29, 2008

Time: 10:00 a.m.

Courtroom: Honorable Howard R. Lloyd

TO: THE PLAINTIFF, SUSAN SANDELMAN, AS TRUSTEE OF THE ESAN TRUST
AND TO HER ATTORNEYS OF RECORD: COLEMAN & HOROWITT, LLP:

PLEASE TAKE NOTICE that on April 29, 2008, at 10:00 a.m., or as soon thereafter as
the matter may heard in Courtroom 2 of the above entitled Court, located at 280 First Street, San
Jose, California 95113, the defendant, B & B Management Group, LLC, dba Bellach's Leather
for Living, erroneously sued herein as B & B Property Management, LLC, dba Bellach's Leather
for Living ("the moving party") will and hereby does move the Court to stay further proceedings
on this case pending arbitration, pursuant to U.S.C. §3, on the ground that the parties, or their
successor in interest hereto, agreed in writing that issues raised in this action would be arbitrated
and no other, nonarbitrable claims are raised in this action.

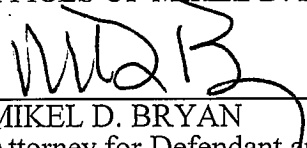
This motion will be based on this Notice of Motion and Motion, the Memorandum of
Points and Authorities filed herewith, the Declaration of Jerome Bellach, the managing member

1 of the moving party, the pleadings, records and papers filed herein, and such other and further
2 oral and documentary evidence and legal memoranda as may be presented at or by the hearing on
3 said Motion.

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5 Dated: April 4, 2008

LAW OFFICES OF MIKEL D. BRYAN, P.C.

6
7 By:


MIKEL D. BRYAN
Attorney for Defendant and Moving Party,
B & B Management Group, LLC, dba Bellach's
Leather for Living